

EXHIBIT 16

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE NATIONAL PRESCRIPTION OPIATE
LITIGATION

This document relates to:

*City of Cleveland, et al. v. Purdue Pharma
L.P., et al.*, Case No. 18-OP-45132;

*County of Cuyahoga, et al. v. Purdue
Pharma L.P., et al.*, Case No. 17-OP-
45004;

*County of Summit, et al. v. Purdue Pharma,
L.P. et al.*, Case No. 18-OP-45090

MDL 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

Mag. Judge David A. Ruiz

**PLAINTIFFS SUMMIT COUNTY, CUYAHOGA COUNTY, AND THE CITY
OF CLEVELAND'S SUPPLEMENTAL OBJECTIONS AND RESPONSES TO
DISTRIBUTOR DEFENDANTS' INTERROGATORY NOS. 24, 25, 26, AND 27**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and the Case Management Order in *In re National Prescription Opiate Litigation*, No. 1:17-cv-2804 (Dkt No. 232), the Summit County, Cuyahoga County, and the City of Cleveland ("Plaintiffs") hereby supplement their responses to Distributor Defendants' Interrogatories 24, 25, 26, and 27 (the "Interrogatories" and, each individually, an "Interrogatory"), as follows:

OBJECTIONS

Plaintiffs repeat and reassert their prior general objections to the Distributor Defendants' Fourth Set of Interrogatories.

SPECIFIC RESPONSES AND OBJECTIONS

Interrogatory 24: Identify all false and/or fraudulent information that You allege any Distributor Defendant supplied to the Drug Enforcement Administration about Suspicious Orders as alleged in Paragraph 859 of the Second Amended Complaint.

Supplemental Response:

Plaintiffs repeat and reassert their prior objections and adopt their prior responses to this Interrogatory. In addition, Plaintiffs respond as follows:

Among the false and fraudulent information that each of the Distributor Defendants supplied the DEA were: (a) information suggesting that the quotas for prescription opioids should be increased; (b) the Distributors were complying with their obligations to maintain effective controls against diversion of their prescription opioids; (c) the Distributors were complying with their obligations to design and operate a system to disclose to the registrant suspicious orders of their prescription opioids; (d) the Distributors were complying with their obligation to notify the DEA of any suspicious orders or diversion of their prescription opioids; and (e) the Distributors did not have the capability to identify suspicious orders of controlled substances. In addition, statements submitted to the DEA were fraudulent because Defendants, including Distributor Defendants, were aware of suspicious orders of prescription opioids and the diversion of their prescription opioids into the illicit market, and failed to include this information to the DEA in their mandatory reports and applications for production quotas or allocations of a manufacturer's portion of the quota, thus rendering the statements made in those submissions misleading and fraudulent. As set forth in ¶ 859 and elsewhere in the Complaint, Plaintiffs also rely on these omissions in support of their RICO claims.

In particular, the submissions to the DEA that contained false and/or fraudulent information, included: (a) documents and communications that supported and/or facilitated the Manufacturers' requests for higher aggregate production quotas, individual production quotas, and procurement quotas; (b) each Distributor's DEA registrations, along with documents and communications that supported and/or facilitated those registrations; and (c) all records and reports that were submitted to the DEA pursuant to 21 U.S.C. § 827. Each of these communications was fraudulent and misleading because each failed to disclose that (1) the Distributor submitting it had no

adequate system to detect and investigate suspicious orders; (2) to the extent such systems existed, the Distributors did not follow them; and (3) orders that were or should have been identified as suspicious had been shipped without clearance and, indeed, without investigation.

Plaintiffs are unable, at this time, to provide Bates numbers of specific documents in which each particular Defendant supplied the above-described false and/or fraudulent information to the DEA, because such information is in the possession of the Defendants. To the extent that documents reflecting these details have been produced to the Plaintiffs, Plaintiffs note that, to date, the RICO Defendants have produced 13,110,844 documents, 2,284,887 of which were produced after the October 25 “substantial completion” date. From the current production, which is growing on a daily basis, Plaintiffs have identified a subset, consisting of approximately 1,259,493 documents, that may provide information responsive to this Interrogatory. Plaintiffs are actively engaged in the review of these documents. To the extent that Plaintiffs have already identified particular documents in which the false and/or fraudulent information was supplied, such information is reflected in Appendix A, attached hereto.

Plaintiffs reserve this right to supplement this answer with additional false and fraudulent information supplied by the Defendants to the DEA with respect to suspicious orders [and/or additional details about Defendants’ false statements] supplied, as such additional information becomes available in discovery.

Interrogatory 25: Identify with specificity each of the predicate acts of racketeering activity You allege each of AmerisourceBergen Drug Corporation, Cardinal Health, Inc. and McKesson Corporation committed, conspired to commit, and/or aided and abetted the commission of for the time period you seek damages in this lawsuit. For each predicate act, provide the date, the conduct that constituted the predicate act, the Defendant(s) involved, the reason that conduct constituted a predicate act of racketeering, and any other individuals/entities involved.

Supplemental Response:

Plaintiffs repeat and reassert their prior objections and adopt their prior responses to this Interrogatory. In addition, Plaintiffs respond as follows:

The predicate acts of racketeering that each of AmerisourceBergen Drug Corporation, Cardinal Health, Inc. and McKesson Corporation committed, conspired to commit, and/or aided and abetted the commission of include: (a) multiple acts of mail fraud in violation of 18 U.S.C. § 1341; (b) multiple acts of wire fraud in violation of 18 U.S.C. § 1343; (c) multiple violations of 21 U.S.C. § 823.

The conduct that constituted each predicate act under 21 U.S.C. § 823 consisted of knowingly or intentionally furnishing false or fraudulent information in, and/or omitting material information from, documents filed with the DEA, as described in response to Interrogatory 24 above. The conduct that constituted each predicate act of mail fraud and wire fraud consisted of: (a) mailing or electronically transmitting the false and fraudulent information set forth in the response to Interrogatory 24 above to the DEA, to other regulators, and/or to other recipients; and (b) mailing or electronically transmitting other materials in furtherance of the scheme described in the Complaint. The conduct constituted predicate acts of racketeering because each violation constituted an act indictable under one of the provisions set forth in 18 U.S.C. § 1961. Each mailing, transmission, or false and fraudulent report under the Controlled Substances Act, constitutes a separate predicate act.

Plaintiffs are working diligently to identify the precise date, document details, and Defendant associated with each predicate act of mail fraud, wire fraud, and violation of the Controlled Substances Act. The documents evidencing each such violation are in the custody of the Defendants. To date, the RICO Defendants have produced 13,110,844 documents, 2,284,887 of which were produced after the October 25 "substantial completion" date. From the current production, which is growing on a daily basis, Plaintiffs have identified a subset, consisting of approximately 1,259,493 documents, that may provide information responsive to this Interrogatory. Plaintiffs are actively engaged

in the review of these documents. To date, Plaintiffs have identified particular documents evidencing specific instances of mail fraud, wire fraud or violation of the Controlled Substances Act; these documents reflect the date on and the circumstances under which the predicate act occurred and the identity of the particular Defendant associated with that predicate act. The documents containing this information are included in Appendix A, attached hereto, and are further included in Plaintiffs' discovery responses, including but not limited to, responses regarding suspicious orders.

Plaintiffs reserve this right to supplement this answer with additional instances of predicate acts and/or additional details about the predicate acts identified above, as such additional information becomes available in discovery.

Interrogatory 26: Identify all facts and evidence that support Your contention that the Distributor Defendants agreed to implement similar tactics in their refusal to report Suspicious Orders as alleged in Paragraph 922 of the Second Amended Complaint.

Supplemental Response:

Plaintiffs repeat and reassert their prior objections and adopt their prior responses to this Interrogatory. Plaintiffs also object on the ground that Defendants have mis-stated the allegations of ¶ 922 of the Second Amended Complaint. That paragraph alleges, in its entirety: "Indeed, for the Defendants' fraudulent scheme to work, each of the Defendants had to agree to implement similar tactics regarding manufacturing prescription opioids and refusing to report suspicious orders." *Summit* SAC ¶ 922. Thus, this particular paragraph does not allege, as a factual proposition, that the Distributor Defendants did agree, as the Interrogatory would have it, but rather alleges as a logical matter that it was necessary for the Distributor Defendants to agree in order for the scheme to be successful. Nonetheless, because Plaintiffs have elsewhere alleged that the Distributor Defendants did in fact agree (and the logical statement in ¶ 922 is part of the support for such allegations), Plaintiffs respond as follows:

Multiple distinct categories of evidence give rise to a strong inference that the Defendants agreed to implement similar tactics with respect to refusing to report suspicious orders. As described in greater detail below, these categories of evidence include: (1) the structure of the legal requirements under the CSA, as set forth in the Complaint; (2) evidence of the opportunities Defendants had to communicate and cooperate, as set forth in the Complaint; (3) testimony developed in depositions about the similarity of Defendants' conduct; and (4) documents Plaintiffs have obtained in discovery that support the inference that Defendants agreed on a strategy of not reporting suspicious orders to the DEA.

First, as alleged in the Complaint, the structure of the legal requirements applicable to registrants under the CSA gives rise to an inference that Defendants agreed among themselves not to report suspicious orders. As explained in the Complaint:

As "registrants" under the CSA, the RICO Supply Chain Defendants are duty bound to identify and report 'orders of unusual size, orders deviating substantially from a normal pattern, and orders of unusual frequency.' Critically, these Defendants' responsibilities do not end with the products they manufacture or distribute—there is no such limitation in the law because their duties cut across company lines. Thus, when these Defendants obtain information about the sales and distribution of other companies' opioid products, as they did through data mining companies like IMS Health, they were legally obligated to report that activity to the DEA.

If morality and the law did not suffice, competition dictates that the RICO Supply Chain Defendants would turn in their rivals when they had reason to suspect suspicious activity. Indeed, if a manufacturer or distributor could gain market share by reporting a competitor's illegal behavior (causing it to lose a license to operate, or otherwise inhibit its activity), ordinary business conduct dictates that it would do so. Under the CSA this whistleblower or watchdog function is not only a protected choice, but a statutory mandate. Unfortunately, however, that is not what happened. Instead, knowing that investigations into potential diversion would only lead to shrinking markets, the Rico Supply Chain Defendants elected to operate in a conspiracy of silence, in violation of both the CSA and RICO.

The RICO Supply Chain Defendants' scheme required the participation of all. If any one member broke rank, its compliance activities would highlight deficiencies of the others, and the artificially high quotas they maintained through their scheme would crumble. But, if all the members of the enterprise conducted themselves in the same manner, it would be difficult for the DEA to go after any one of them. Accordingly, through the connections they made as a result of their participation in the Healthcare Distribution Alliance ('HAD' [sic]), the RICO Supply Chain Defendants chose to flout the closed system designed to protect the citizens. Publicly, in 2008, they announced their formulation of 'Industry Compliance Guidelines: Reporting Suspicious Orders and Prevention Diversion of Controlled Substances.' But, privately, the RICO Supply Chain Defendants refused to act and through their lobbying efforts, they collectively sought to undermine the impact of the CSA. Indeed, despite the issuance of these Industry Compliance Guidelines, which recognize these Defendants' duties under the law, as illustrated by the subsequent industry-wide enforcement actions and consent orders issued after that time, none of them complied. John Gray, President and CEO of the HDA said to Congress in 2014, it is 'difficult to find the right balance between proactive antidiversion efforts while not inadvertently limiting access to appropriately prescribed and dispensed medications.' Yet, the RICO Supply Chain Defendants apparently all found the same profit-maximizing balance -- intentionally remaining silent to ensure the largest possible financial return.

Complaint ¶¶ 851-853; *see also* Complaint ¶ 551 ("The Defendants also had reciprocal obligations under the CSA to report suspicious orders of other parties if they became aware of them. Defendants were thus collectively responsible for each other's compliance with their reporting obligations."); ¶¶ 552-53 ("Defendants thus knew that their own conduct could be reported by other distributors or manufacturers and that their failure to report suspicious orders they filled could be brought to the DEA's attention. As a result, Defendants had an incentive to communicate with each other about the reporting of suspicious orders to ensure consistency in their dealings with DEA. The desired consistency was achieved. As described below, none of the Defendants reported suspicious orders and the flow of opioids continued unimpeded."); ¶¶ 760-766 (describing Defendants' incentives to cooperate and their opportunities for doing so).

Second, the Complaint describes opportunities that Defendants had to communicate and cooperate further supports the inference that Defendants agreed on a common course of failing to report suspicious orders:

In addition, Defendants worked together to achieve their common purpose through trade or other organizations, such as the Pain Care Forum ("PCF") and the HDA.

The PCF has been described as a coalition of drug makers, trade groups and dozens of non-profit organizations supported by industry funding, including the Front Groups described in this Complaint. The PCF recently became a national news story when it was discovered that lobbyists for members of the PCF quietly shaped federal and state policies regarding the use of prescription opioids for more than a decade.

....

The Defendants who stood to profit from expanded prescription opioid use are members of and/or participants in the PCF. In 2012, membership and participating organizations included Endo, Purdue, Actavis and Cephalon. Each of the Marketing Defendants worked together through the PCF. But the Marketing Defendants were not alone. The Distributor Defendants actively participated, and continue to participate in the PCF, at a minimum, through their trade organization, the HDA. The Distributor Defendants participated directly in the PCF as well.

Additionally, the HDA led to the formation of interpersonal relationships and an organization among the Defendants. Although the entire HDA membership directory is private, the HDA website confirms that each of the Distributor Defendants and several of the Marketing Defendants, including Actavis, Endo, Purdue, Mallinckrodt, and Cephalon, were members of the HAD. Additionally, the HDA and each of the Distributor Defendants, eagerly sought the active membership and participation of the Marketing Defendants by advocating for the many benefits of members, including "strengthen[ing] . . . alliances."

Beyond strengthening alliances, the benefits of HDA membership included the ability to, among other things, "network one on one with manufacturer executives at HDA's members-only Business and Leadership Conference," "networking with HDA wholesale distributor members," "opportunities to host and sponsor HDA Board of Directors events," "participate on HDA committees, task forces and working groups with peers and trading partners," and "make connections." Clearly, the HDA and the Defendants believed that membership in the HDA was an opportunity to create

interpersonal and ongoing organizational relationships and “alliances” between the Marketing and Distributor Defendants.

....

The closed meetings of the HDA’s councils, committees, task forces and working groups provided the Marketing and Distributor Defendants with the opportunity to work closely together, confidentially, to develop and further the common purpose and interests of the enterprise.

The HDA also offers a multitude of conferences, including annual business and leadership conferences. The HDA and the Distributor Defendants advertise these conferences to the Marketing Defendants as an opportunity to “bring together high-level executives, thought leaders and influential managers . . . to hold strategic business discussions on the most pressing industry issues.” The conferences also gave the Marketing and Distributor Defendants “unmatched opportunities to network with [their] peers and trading partners at all levels of the healthcare distribution industry.” The HDA and its conferences were significant opportunities for the Marketing and Distributor Defendants to interact at a high-level of leadership. It is clear that the Marketing Defendants embraced this opportunity by attending and sponsoring these events.

....

The Distributor Defendants and Marketing Defendants also participated, through the HDA, in Webinars and other meetings designed to exchange detailed information regarding their prescription opioid sales, including purchase orders, acknowledgements, ship notices, and invoices. For example, on April 27, 2011, the HDA offered a Webinar to “accurately and effectively exchange business transactions between distributors and manufacturers” The Marketing Defendants used this information to gather high-level data regarding overall distribution and direct the Distributor Defendants on how to most effectively sell prescription opioids.

Taken together, the interaction and length of the relationships between and among the Marketing and Distributor Defendants reflects a deep level of interaction and cooperation between two groups in a tightly knit industry. The Marketing and Distributor Defendants were not two separate groups operating in isolation or two groups forced to work together in a closed system. Defendants operated together as a united entity, working together on multiple fronts, to engage in the unlawful sale of prescription opioids.

The HDA and the PCF are but two examples of the overlapping relationships, and concerted joint efforts to accomplish common goals and demonstrates that the leaders of each of the Defendants were in communication and cooperation.

Summit SAC ¶¶ 531-544. The SAC includes footnotes providing evidentiary support for these allegations, including:

- Matthew Perrone & Ben Wieder, *Pro-Painkiller Echo Chamber Shaped Policy Amid Drug Epidemic*, The Ctr. for Pub. Integrity.¹
- PAIN CARE FORUM 2012 Meetings Schedule, (last updated December 2011), <https://assets.documentcloud.org/documents/3108982/PAIN-CARE-FORUM-Meetings-Schedule-amp.pdf>
- Executive Committee, Healthcare Distribution Alliance, <https://www.healthcaredistribution.org/about/executive-committee> (last accessed Apr. 25, 2018).
- Manufacturer Membership, Healthcare Distribution Alliance, <https://www.healthcaredistribution.org/about/membership/manufaturer>.
- *Business and Leadership Conference – Information for Manufacturers*, Healthcare Distribution Alliance, <https://www.healthcaredistribution.org/events/2015-business-and-leadership-conference/blc-for-manufacturers>
- *2015 Distribution Management Conference and Expo*, Healthcare Distribution Alliance, <https://web.archive.org/web/20160119143358/https://www.healthcaredistribution.org/events/2015-distribution-management-conference>.

More specifically, the Complaint explains:

Publications and guidelines issued by the HDA . . . confirm that the Defendants utilized their membership in the HDA to form agreements. Specifically, in the fall of 2008, the HDA published the Industry Compliance Guidelines: Reporting Suspicious Orders and Preventing Diversion of Controlled Substances (the “Industry Compliance Guidelines”) regarding diversion. As the HDA explained in an amicus brief, the Industry Compliance Guidelines were the result of “[a] committee of HDMA members contribut[ing] to the development of this publication” beginning in late 2007.

This statement by the HDA and the Industry Compliance Guidelines support the allegation that Defendants utilized the HDA to form agreements about their approach to their duties under the CSA. As John M. Gray, President/CEO of the HDA stated to the Energy and Commerce

¹ <https://www.publicintegrity.org/2016/09/19/20201/pro-painkiller-echo-chamber-shaped-policy-amid-drug-epidemic> (last updated Dec. 15, 2016, 9:09 AM)

Subcommittee on Health in April 2014, is “difficult to find the right balance between proactive anti-diversion efforts while not inadvertently limiting access to appropriately prescribed and dispensed medications.” Here, it is apparent that all of the Defendants found the same balance—an overwhelming pattern and practice of failing to identify, report or halt suspicious orders, and failure to prevent diversion.

Summit SAC at ¶¶ 545-546.

Third, deposition testimony so far has provided additional evidence that Defendants agreed among themselves not to report suspicious order. For example, representations of CAH, MCK and ABDC have now all testified about policies with respect to halting shipment of suspicious orders prior to DEA enforcement actions in 2007. This testimony shows that all three had the same policy: all of them refused to halt shipments that were identified as suspicious because they were excessive. *See* Deposition of Chris Zimmerman (ABDC), at 110:16-22; 121:7-122:3; Deposition of Jennifer Norris (Cardinal), at 128:8-129:14; 130:7-14; 133:17-24; Deposition of Steve Reardon (Cardinal), at 240:14-242:4; Deposition of Nathan Hartle (McKesson), at 119:8-20; 130:22-131:5; Deposition of Blaine Snider (McKesson), at 50:9-12; 71:4-7. Given that this approach was in direct violation of the law, it would be surprising if all three decided to adopt it independently. Similarly, during that time period, ABDC, CAH and MCK all utilized the same tactic to identify suspicious orders using a threshold based system. Witnesses for ABDC, CAH and MCK all testified that they used the same tactic for calculating thresholds by applying a 300% multiplier against average sales. MCK, CAH and ABDC all testified that they used the same tactics to arrive at these thresholds by allegedly using DEA guidance from a document that was available on DEA’s website. *See* Deposition of Chris Zimmerman (ABDC), at 129:10-19; 132:8-133:22; Deposition of Jennifer Norris (Cardinal), at 134:15-23; 246:15-247:4; Deposition of Steve Reardon (Cardinal), at 440:10-442:16; Deposition of Blaine Snider (McKesson), at 67:1-21. ABDC identified this document as the Chemical Handlers Manual, attached as Exhibit 4 to the Zimmerman deposition. This document indicates that the 300% threshold – identified by CAH, MCK and ABDC as the

common tactic they used to form their thresholds – does not apply to schedule II or III drugs. Instead it applies only to listed chemicals. *See* Exhibit 4 to Zimmerman Deposition, at p. 43. Nonetheless, all three of CAH, MCK, and ABDC managed to come up with the same misuse of the same guidance, again further evidence that their approach was the subject of an agreement.² While it is certainly plausible that three different industry players might independently come up with the same “best practices” approach, where there is consensus and guidance about those “best practices,” here CAH, MCK, and ABDC all came with a “worst practices” approach that failed to meet their statutory and regulatory obligations to implement a system to detect suspicious orders; investigate orders flagged as suspicious; and halt shipments pending investigation and clearance of suspicious orders. These facts support the inference that they agreed on this approach among themselves.

Fourth, documentary evidence produced in discovery supports the inference that the Distributor Defendants agreed on a tactic of not reporting suspicious orders. To date, the RICO Defendants have produced 13,110,844 documents, 2,284,887 of which were produced after the October 25 “substantial completion” date. From the current production, which is growing on a daily basis, Plaintiffs have identified a subset, consisting of approximately 1,259,493 documents, that may provide information responsive to this Interrogatory. Plaintiffs are actively engaged in the review of these documents. To date, Plaintiffs have identified particular documents evidencing agreement among the Defendants. The documents containing this information are the

² This should not be a surprise given that the National Wholesale Druggists’ Association (NWDA) [predecessor entity to the HDA] provided members for the Suspicious Order Task Force that was convened in 1996 and issued a report in 1998. (Notably, Doug Thompson, Sr., VP, Logistics, McKesson Corp. is listed as the organizational representative for the NWDA.) Information regarding threshold calculations in the “guidance” contained in the Chemical Handlers’ Manual was taken from the report of that Task Force.

following: ABDCMDL00043412; ABDCMDL00043401; ABDCMDL00043355;
ABDCMDL00044026; ABDCMDL00043379; ABDCMDL00043504; ABDCMDL00043531;
ABDCMDL00044051; ABDCMDL00043699; ABDCMDL00043676; ABDCMDL00043880;
ABDCMDL00043865; ACTAVIS0628811; CAH_MDL2804_00133712;
PPLPC008000060819; ALLERGAN_MDL_03744222; ENDO-OPIOID_MDL-01056164;
Acquired_Actavis_01044944; MNK-T1_0000574277; MNK-T1_0000574362; MNK-
T1_0000574570; CAH_MDL2804_01659931; CAH_MDL2804_01600111;
CAH_MDL2804_01773826; CAH_MDL2804_02309085; CAH_MDL2804_02309086;
CAH_MDL2804_02701372; CAH_MDL2804_02701368; PPLPC004000249167,
PPLPC004000249170, PPLPC004000244940, PPLPC004000245298, PPLPC004000245474,
MCKMDL00353308, PPLPC004000239934, INSYS-MDL-008625863, MCKMDL00353316,
CAH_MDL2804_02100389, PPLPC004000317962, INSYS-MDL-000292465,
PPLPC002000247542, PPLPC018000152012, PPLPC004000070901,
CAH_MDL2804_02103500.

Plaintiffs reserve this right to supplement this answer with additional information, as such information becomes available in discovery.

Interrogatory 27: Identify and describe each statement or omission relating to Prescription Opioids that were made or disseminated by any of the Manufacturer Defendants and that You allege the Distributor Defendants knew were false, misleading, unfair, deceptive or otherwise actionable and, for each, identify each specific Distributor Defendant who had such knowledge, explain the basis for your contention that it had such knowledge, state the specific act(s) or omission(s) that each Distributor Defendant took with such knowledge, and describe how such act(s) or omission(s) caused a quantifiable harm to You.

Supplemental Response:

Plaintiffs repeat and reassert their prior objections and adopt their prior responses to this Interrogatory. In addition, Plaintiffs respond as follows:

The Complaint does not allege that the Distributor Defendants knew that any of the statements made or disseminated by the Manufacturer Defendants were “false,

misleading, unfair, deceptive or otherwise actionable,” and Plaintiffs do not at this time contend that they did. Plaintiffs, however, reserve the right to supplement this answer based on information learned in discovery and, in particular, to contend and prove that the Distributors, or any of them, did know that one or more of the statements made by the Manufacturer Defendants was false, misleading, unfair, deceptive, or otherwise actionable.

Dated: December 14, 2018

/s/ Mark Pifko

Mark Pifko
BARON & BUDD, P.C.
15910 Ventura Boulevard, Suite 1600
Los Angeles, CA 91436
Tel.: 818-839-2333
Fax: 214-520-1181
mpifko@baronbudd.com

Stephen S. Zashin (Ohio Bar No.
0064557)
Ami J. Patel (Ohio Bar No.0078201)
Christopher S. Caspary (Ohio Bar No.
0091350)
ZASHIN & RICH CO. LPA
950 Main Avenue, 4th Floor
Cleveland, Ohio 44113
Tel: 216-696-4441
Fax: 216-696-1618
ssz@zrlaw.com; ajp@zrlaw.com;
cdc@zrlaw.com

Peter J. Mougey
Jeffrey Gaddy
LEVIN, PAPANTONIO, THOMAS,
MITCHELL, RAFFERTY &
PROCTOR, P.A.
316 S. Baylen Street, Suite 600
Pensacola, FL 32502-5996
Tel.: 850-435-7068
Fax: 850-436-6068
pmougey@levinlaw.com;
jgaddy@levinlaw.com

Counsel for Plaintiff City of Cleveland

Plevin & Gallucci

/s/ Frank Gallucci

Frank Gallucci (0072680)

55 Public Square, Suite 2222

Cleveland, Ohio 44113

fgallucci@pglawyer.com

Phone: (216) 861-0804

Napoli Shkolnik PLLC

/s/ Hunter J. Shkolnik

Hunter J. Shkolnik (admitted *pro hac vice*)

Salvatore C. Badala (admitted *pro hac vice*)

Joseph L. Ciaccio (admitted *pro hac vice*)

360 Lexington Avenue

New York, New York 10017

hunter@napolilaw.com

sbadala@napolilaw.com

jciaccio@napolilaw.com

Phone: (212) 397-1000

Scott Elliot Smith L.P.A.

/s/ Scott Elliot Smith

Scott Elliot Smith (0003749)

5003 Horizons Dr., Suite 200

Columbus, Ohio 43220

Phone: (614) 846-1700

ses@sestrialaw.com

Thrasher Dinsmore & Dolan L.P.A.

/s/ Leo M. Spellacy, Jr.

Leo M. Spellacy, Jr. (0067304)

1111 Superior Avenue

Suite 412

Cleveland, Ohio 44114

Phone: (216) 255-5450

By: /s/ Linda Singer

Linda Singer

Joseph F. Rice

Jodi Westbrook Flowers

Anne McGinness Kears

David I. Ackerman

Jeffrey C. Nelson
MOTLEY RICE LLC
401 9th Street NW, Suite 1001
Washington, DC 20004
Tel: (202) 232-5504

APPENDIX A

ENDO-CHI_LIT-00135229	ENDO-CHI_LIT-00190616	ACTAVIS1136380	ACTAVIS1136382
ACTAVIS1146770	ACTAVIS0241855	ACTAVIS0628811	ABDCMDL00000362
ABDCMDL00002232	ABDCMDL00002233	ABDCMDL00002234	ABDCMDL00002235
ABDCMDL00002237	ABDCMDL00002238	ABDCMDL00002239	ABDCMDL00002240
ABDCMDL00002241	ABDCMDL00002242	ABDCMDL00002243	ABDCMDL00002244
ABDCMDL00002245	ABDCMDL00002246	ABDCMDL00002247	ABDCMDL00002248
ABDCMDL00002985	ABDCMDL00003505	ABDCMDL00003506	ABDCMDL00003507
ABDCMDL00003508	ABDCMDL00003509	ABDCMDL00003510	JAN-MS-00000011
ALLERGAN_MDL_00636218	JAN-MS-00285119	JAN-MS-00398651	JAN-MS-00399216
JAN-MS-00399217	JAN-MS-00419203	JAN-MS-00419205	JAN-MS-00671398
JAN-MS-00934458	JAN-MS-00986085	JAN-MS-00986088	JAN-MS-00988156
JAN-MS-02134709	JAN-MS-02134710	JAN-MS-02134720	MCKMDL00332932
ALLERGAN_MDL_01006518	ALLERGAN_MDL_01096184	ALLERGAN_MDL_01096210	ALLERGAN_MDL_01144584
ALLERGAN_MDL_01144589	ALLERGAN_MDL_01144600	PPLP003477009	MNK-T1_0000264096
MNK-T1_0000264386	MNK-T1_0000268892	MNK-T1_0000273471	MNK-T1_0000273559
MNK-T1_0000273563	MNK-T1_0000273579	MNK-T1_0000273876	MNK-T1_0000273878
MNK-T1_0000274154	MNK-T1_0000274156	MNK-T1_0000275197	MNK-T1_0000275223
MNK-T1_0000275258	MNK-T1_0000275259	MNK-T1_0000275304	MNK-T1_0000278806
MNK-T1_0000279203	MNK-T1_0000280965	MNK-T1_0000281324	MNK-T1_0000281399
MNK-T1_0000281402	MNK-T1_0000281808	MNK-T1_0000281810	MNK-T1_0000281817
MNK-T1_0000281819	MNK-T1_0000281824	MNK-T1_0000281829	MNK-T1_0000281860
MNK-T1_0000282916	MNK-T1_0000282919	MNK-T1_0000283646	MNK-T1_0000284131
MNK-T1_0000284133	MNK-T1_0000284150	MNK-T1_0000284178	MNK-T1_0000284181

MNK-T1_0000284183	MNK-T1_0000285843	MNK-T1_0000285848	MNK-T1_0000285856
MNK-T1_0000285861	MNK-T1_0000285865	MNK-T1_0000285869	MNK-T1_0000288985
MNK-T1_0000288988	MNK-T1_0000289325	MNK-T1_0000289327	MNK-T1_0000289401
MNK-T1_0000289402	MNK-T1_0000289404	MNK-T1_0000290441	MNK-T1_0000290447
MNK-T1_0000290456	MNK-T1_0000290467	MNK-T1_0000290469	MNK-T1_0000290706
MNK-T1_0000291420	MNK-T1_0000291422	MNK-T1_0000291424	MNK-T1_0000291426
MNK-T1_0000291428	MNK-T1_0000291430	MNK-T1_0000291432	MNK-T1_0000108980
MNK-T1_0000299576	MNK-T1_0000299578	MNK-T1_0000337947	MNK-T1_0000364969
MNK-T1_0000364974	MNK-T1_0000364986	MNK-T1_0000365003	MNK-T1_0000365010
MNK-T1_0000365017	MNK-T1_0000365019	MNK-T1_0000365021	MNK-T1_0000365028
MNK-T1_0000365035	MNK-T1_0000370543	MNK-T1_0000370544	MNK-T1_0000370545
MNK-T1_0000370548	MNK-T1_0000370550	MNK-T1_0000370860	MNK-T1_0000370861
MNK-T1_0000370863	MNK-T1_0000370867	MNK-T1_0000384168	MNK-T1_0000384383
MNK-T1_0000384503	MNK-T1_0000387057	MNK-T1_0000387060	MNK-T1_0000387061
MNK-T1_0000391965	MNK-T1_0000392073	MNK-T1_0000490852	MNK-T1_0000490854
MNK-T1_0000504343	MNK-T1_0000504348	MNK-T1_0000506114	ALLERGAN_MDL_01240583
INSYS-MDL-005959045	END00742812	EPI001047898	EPI001059511
EPI001178687	EPI001460811	INSYS-MDL-006972647	ALLERGAN_MDL_01373076
ALLERGAN_MDL_01373077	ALLERGAN_MDL_01373080	ALLERGAN_MDL_01373082	PPLP003518651
PPLP003985532	PPLP003985546	PPLP003985549	PPLP003985559
PPLP003985564	PPLP003985592	PPLP003985595	PPLP003985631
PPLP003985635	PPLP003985638	PPLP003985641	PPLP003985644
PPLP003985647	PPLP003985654	PPLP003985761	PPLP004019275
PPLP004019279	PPLP004021333	PPLP004021406	PPLP004021595
PPLP004021661	PPLP004021664	PPLP004022118	PPLP004022788
PPLP004046400	PPLP004046402	PPLP004046943	PPLP004046945

PPLP004052910	PPLP004052994	PPLP004054309	PPLP004055295
PPLP004065294	PPLP004066024	PPLP004067046	PPLP004067085
PPLP004067125	PPLP004070667	MNK-T1_0000559532	MNK-T1_0000562387
MNK-T1_0000574277	MNK-T1_0000574362	MNK-T1_0000574561	MNK-T1_0000574570
CAH_MDL_PRIORP ROD_DEA12_00011 236	CAH_MDL_PRIORP ROD_DEA12_00013 537	CAH_MDL_PRIORP ROD_DEA07_00827 658	CAH_MDL_PRIORP ROD_DEA07_00827 999
CAH_MDL_PRIORP ROD_DEA07_00828 000	CAH_MDL_PRIORP ROD_DEA07_00828 011	CAH_MDL_PRIORP ROD_DEA07_00828 013	CAH_MDL_PRIORP ROD_DEA07_00828 015
CAH_MDL_PRIORP ROD_DEA07_00828 016	CAH_MDL_PRIORP ROD_DEA07_00828 024	CAH_MDL_PRIORP ROD_DEA07_00828 033	CAH_MDL_PRIORP ROD_DEA07_00828 632
CAH_MDL_PRIORP ROD_DEA07_00836 417	CAH_MDL_PRIORP ROD_DEA07_00842 131	CAH_MDL_PRIORP ROD_DEA07_00864 782	CAH_MDL_PRIORP ROD_DEA07_00864 791
CAH_MDL_PRIORP ROD_DEA07_00875 100	CAH_MDL_PRIORP ROD_DEA07_00875 774	CAH_MDL_PRIORP ROD_DEA07_00877 471	CAH_MDL_PRIORP ROD_DEA07_00880 890
CAH_MDL_PRIORP ROD_DEA07_00881 076	CAH_MDL_PRIORP ROD_DEA07_00945 280	CAH_MDL_PRIORP ROD_DEA07_00945 283	CAH_MDL_PRIORP ROD_DEA07_01009 393
CAH_MDL_PRIORP ROD_DEA07_01009 397	CAH_MDL_PRIORP ROD_DEA07_01109 162	CAH_MDL_PRIORP ROD_DEA07_01109 278	CAH_MDL_PRIORP ROD_DEA07_01147 688
CAH_MDL_PRIORP ROD_DEA07_01147 690	CAH_MDL_PRIORP ROD_DEA07_00109 299	CAH_MDL_PRIORP ROD_DEA07_00110 665	CAH_MDL_PRIORP ROD_DEA07_00322 751
CAH_MDL_PRIORP ROD_DEA07_00322 764	CAH_MDL_PRIORP ROD_DEA07_02741 169	CAH_MDL_PRIORP ROD_DEA07_02767 203	ABDCMDL0004335 5
ABDCMDL0004350 4	ABDCMDL0004353 1	ABDCMDL0004355 5	CAH_MDL_PRIORP ROD_DEA07_01195 604
CAH_MDL_PRIORP ROD_DEA07_01204 244	CAH_MDL_PRIORP ROD_DEA07_01204 246	CAH_MDL_PRIORP ROD_DEA07_02048 161	CAH_MDL_PRIORP ROD_DEA07_02463 052
ENDO-OPIOID_MDL- 00410894	MCKMDL00403682	MCKMDL00403830	MCKMDL00403832
MCKMDL00405140	MCKMDL00405141	MCKMDL00405143	MCKMDL00405217
PDD8901530511	MCKMDL00411729	MCKMDL00427152	MCKMDL00427153
ABDCMDL0015644 9	ABDCMDL0015645 0	ABDCMDL0015658 2	ABDCMDL0015688 1

ABDCMDL0015812 6	ABDCMDL0015814 4	ABDCMDL0015814 8	ABDCMDL0015815 8
ABDCMDL0015815 9	ABDCMDL0015820 0	ABDCMDL0015820 5	ABDCMDL0015820 9
ABDCMDL0015827 2	ABDCMDL0015827 4	ABDCMDL0015878 9	ABDCMDL0015881 1
ABDCMDL0015881 2	ABDCMDL0015897 8	ABDCMDL0015942 3	ABDCMDL0016055 3
ABDCMDL0016072 4	ABDCMDL0016128 4	ABDCMDL0016164 2	ABDCMDL0016311 3
ABDCMDL0016369 5	ABDCMDL0016541 5	ABDCMDL0016836 4	ABDCMDL0016836 8
ABDCMDL0016838 4	ABDCMDL0016838 5	ABDCMDL0016840 7	ABDCMDL0016840 8
ABDCMDL0016842 1	ABDCMDL0016842 2	ABDCMDL0016950 8	ABDCMDL0016953 5
ABDCMDL0016953 7	ABDCMDL0004701 7	ABDCMDL0004701 8	ABDCMDL0004937 0
ABDCMDL0004937 1	ABDCMDL0004937 2	ABDCMDL0013713 1	ABDCMDL0013713 2
ABDCMDL0013713 4	ABDCMDL0013713 6	ABDCMDL0013713 7	ABDCMDL0013713 8
ABDCMDL0013713 9	ABDCMDL0013902 6	ABDCMDL0013902 8	ABDCMDL0013964 0
ABDCMDL0013964 2	ABDCMDL0014340 1	ABDCMDL0014345 8	ABDCMDL0014422 1
ABDCMDL0014422 3	ABDCMDL0014422 5	ABDCMDL0014422 6	ABDCMDL0014422 7
ABDCMDL0014423 0	MNK- T1_0000661691	MNK- T1_0000661693	MNK- T1_0000661694
MNK- T1_0000661697	TEVA_MDL_A_007 11125	MNK- T1_0000861184	MNK- T1_0000866405
MNK- T1_0000874105	PKY180255880	PKY181715440	PKY182076760
PKY182693157	MCKMDL00453798	MCKMDL00453800	MCKMDL00454900
MCKMDL00454901	MCKMDL00477223	MCKMDL00477225	MCKMDL00477226
MCKMDL00477228	ALLERGAN_MDL_ 01843703	CAH_MDL2804_001 34146	CAH_MDL2804_001 34155
CAH_MDL2804_001 34160	CAH_MDL2804_001 34162	CAH_MDL2804_001 34169	CAH_MDL2804_001 34170
CAH_MDL2804_001 34182	CAH_MDL2804_001 34186	CAH_MDL2804_001 34204	CAH_MDL2804_001 34222
CAH_MDL2804_001 34223	CAH_MDL2804_001 34252	CAH_MDL2804_001 34270	CAH_MDL2804_001 34271
CAH_MDL2804_001 34275	MCKMDL00487018	MCKMDL00487022	ABDCMDL0017801 9

ABDCMDL0024661 5	ABDCMDL0025154 9	ABDCMDL0026410 7	ABDCMDL0026427 3
ABDCMDL0026453 2	ABDCMDL0026453 4	ABDCMDL0026453 5	ABDCMDL0026480 1
ABDCMDL0026520 8	ABDCMDL0026609 9	ABDCMDL0026610 1	ABDCMDL0026691 0
ABDCMDL0026867 4	ABDCMDL0026969 5	ABDCMDL0027319 5	ABDCMDL0027319 6
ABDCMDL0027320 8	ABDCMDL0027377 9	ABDCMDL0027504 6	ABDCMDL0027505 7
ABDCMDL0027523 5	ABDCMDL0027528 3	ABDCMDL0027543 8	ABDCMDL0027656 2
ABDCMDL0027657 8	ABDCMDL0027806 2	ABDCMDL0027886 5	ABDCMDL0027894 9
ABDCMDL0027985 4	ML00012982	ML00012980	MCKMDL00498022
MCKMDL00498023	MCKMDL00498099	MCKMDL00498221	MCKMDL00498773
MCKMDL00498775	MCKMDL00498776	MCKMDL00498777	MCKMDL00498786
MCKMDL00498802	MCKMDL00498841	MCKMDL00498842	MCKMDL00498846
MCKMDL00516132	MCKMDL00516332	MCKMDL00517039	MCKMDL00519779
MCKMDL00519781	TEVA_MDL_A_010 86999	MCKMDL00535550	MCKMDL00535659
MCKMDL00535830	MCKMDL00535831	MCKMDL00536016	MCKMDL00536017
MCKMDL00536065	MCKMDL00536067	MCKMDL00536077	MCKMDL00536119
MCKMDL00536121	MCKMDL00536129	MCKMDL00536159	MCKMDL00536186
MCKMDL00536235	MCKMDL00536254	MCKMDL00536288	MCKMDL00536290
MCKMDL00536292	MCKMDL00536335	MCKMDL00536350	MCKMDL00536356
MCKMDL00536361	MCKMDL00536363	MCKMDL00536373	MCKMDL00536407
MCKMDL00536408	MCKMDL00536414	MCKMDL00536416	MCKMDL00536418
MCKMDL00536419	MCKMDL00536426	MCKMDL00536427	MCKMDL00536435
MCKMDL00536436	MCKMDL00536540	MCKMDL00537088	MCKMDL00537089
MCKMDL00537090	MCKMDL00537091	MCKMDL00537195	MCKMDL00538072
MCKMDL00538958	MCKMDL00538962	MCKMDL00539067	JAN-MS-02964984
JAN-MS-02965360	JAN-MS-02966806	ML00055624	ML00072239
TEVA_MDL_A_011 30622	MCKMDL00542161	MCKMDL00542163	MCKMDL00543734
MCKMDL00545161	MCKMDL00545165	MCKMDL00545341	MCKMDL00545342
MCKMDL00545535	MCKMDL00546587	MCKMDL00546653	MCKMDL00546655
MCKMDL00546785	MCKMDL00546788	MCKMDL00547638	MCKMDL00549243
MCKMDL00550350	MCKMDL00553458	ALLERGAN_MDL_ 02128065	ALLERGAN_MDL_ 02128067
ALLERGAN_MDL_ 02166054	ALLERGAN_MDL_ 02166058	MNK- T1_0001009598	SFC00012443
PDD1505110001	ALLERGAN_MDL_ 02176488	ALLERGAN_MDL_ 02467348	ALLERGAN_MDL_ 02467662

HDA_MDL_000003 432	HDA_MDL_000003 955	HDA_MDL_000004 350	HDA_MDL_000004 823
HDA_MDL_000005 183	HDA_MDL_000005 266	TEVA_MDL_A_014 53598	TEVA_MDL_A_014 53601
TEVA_MDL_A_014 53620	TEVA_MDL_A_014 53623	TEVA_MDL_A_014 53638	TEVA_MDL_A_014 53770
TEVA_MDL_A_014 53866	TEVA_MDL_A_014 53868	TEVA_MDL_A_014 53898	TEVA_MDL_A_014 53899
TEVA_MDL_A_014 53994	TEVA_MDL_A_014 53996	TEVA_MDL_A_014 54702	TEVA_MDL_A_014 56731
TEVA_MDL_A_014 56732	TEVA_MDL_A_014 57293	TEVA_MDL_A_014 57782	TEVA_MDL_A_014 63479
TEVA_MDL_A_014 63487	TEVA_MDL_A_014 63501	TEVA_MDL_A_014 63513	TEVA_MDL_A_014 63710
TEVA_MDL_A_014 63717	TEVA_MDL_A_014 63721	TEVA_MDL_A_014 63746	TEVA_MDL_A_014 64010
TEVA_MDL_A_014 64163	TEVA_MDL_A_014 64387	TEVA_MDL_A_014 64388	TEVA_MDL_A_014 64395
TEVA_MDL_A_014 65343	TEVA_MDL_A_014 65344	HDA_MDL_000006 613	HDA_MDL_000006 616
HDA_MDL_000006 621	HDA_MDL_000006 623	HDA_MDL_000006 625	HDA_MDL_000006 626
HDA_MDL_000006 683	HDA_MDL_000006 691	HDA_MDL_000006 693	HDA_MDL_000006 694
HDA_MDL_000006 789	HDA_MDL_000006 791	HDA_MDL_000007 152	HDA_MDL_000007 153
HDA_MDL_000007 154	HDA_MDL_000007 155	HDA_MDL_000008 713	HDA_MDL_000008 716
HDA_MDL_000010 836	HDA_MDL_000014 815	HDA_MDL_000014 961	HDA_MDL_000015 060
HDA_MDL_000015 062	HDA_MDL_000015 102	ENDO- OPIOID_MDL- 01453789	ENDO- OPIOID_MDL- 01475255
HDA_MDL_000015 814	HDA_MDL_000015 815	HDA_MDL_000015 897	HDA_MDL_000016 111
HDA_MDL_000019 845	HDA_MDL_000020 020	MNK- T1_0001125972	MNK- T1_0001139112
MNK- T1_0001139113	MNK- T1_0001139118	MCKMDL00556584	MCKMDL00556586
MCKMDL00556587	MCKMDL00556589	MCKMDL00556631	MCKMDL00556633
MCKMDL00558910	HDA_MDL_000022 934	TEVA_MDL_A_020 63833	TEVA_MDL_A_020 63834
TEVA_MDL_A_020 63938	TEVA_MDL_A_022 46859	ABDCMDL0029500 6	ENDO- OPIOID_MDL- 02219844
ENDO-	ENDO-	ENDO-	HDA_MDL_000024

OPIOID_MDL-02219847	OPIOID_MDL-02219848	OPIOID_MDL-02292634	886
HDA_MDL_000024887	HDA_MDL_000024888	HDA_MDL_000024889	HDA_MDL_000024908
HDA_MDL_000024929	HDA_MDL_000025173	HDA_MDL_000025323	HDA_MDL_000025372
HDA_MDL_000025373	HDA_MDL_000025432	HDA_MDL_000025436	HDA_MDL_000025437
HDA_MDL_000025438	HDA_MDL_000025439	HDA_MDL_000025483	HDA_MDL_000025696
HDA_MDL_000025697	HDA_MDL_000025859	HDA_MDL_000025860	HDA_MDL_000025949
HDA_MDL_000025950	HDA_MDL_000026185	HDA_MDL_000026187	HDA_MDL_000026445
HDA_MDL_000026447	HDA_MDL_000026449	HDA_MDL_000026456	HDA_MDL_000026494
HDA_MDL_000026512	HDA_MDL_000026524	HDA_MDL_000026527	AAPA_00026010
MCKMDL00575490	MCKMDL00578069	JAN-MS-02984629	JAN-MS-02987650
JAN-MS-02987651	PPLP004266075	PPLP004269875	PPLP004269876
PPLP004283591	PPLP004285445	PPLP004285954	PPLP004285957
PPLP004285965	PPLP004285967	PPLP004285968	PPLP004285972
PPLP004285978	PPLP004285979	PPLP004287450	PPLP004300216
PPLP004301234	PPLP004301237	PPLP004303456	PPLP004325477
MNK-T1_0001806100	MNK-T1_0001806101	PPLPC004000132508	PPLPC004000132946
PPLPC004000139384	PPLPC004000147352	PPLPC004000182848	PPLPC004000183479
PPLPC004000209315	PPLPC004000246752	PPLPC004000255951	PPLPC004000272658
PPLPC004000286561	PPLPC004000287172	PPLPC004000287173	PPLPC004000287176
PPLPC004000287179	PPLPC004000287188	PPLPC004000287191	PPLPC004000287194
PPLPC004000287198	PPLPC004000287201	PPLPC004000287204	PPLPC004000287207
PPLPC004000287349	PPLPC004000287383	PPLPC004000287387	PPLPC004000287411
PPLPC004000287415	PPLPC004000287541	PPLPC004000287575	PPLPC004000287592
PPLPC004000287596	PPLPC004000290274	PPLPC004000290276	PPLPC004000290292
PPLPC004000291793	PPLPC004000291797	PPLPC004000291802	PPLPC004000291805
PPLPC00400029180	PPLPC00400029181	PPLPC00400029196	PPLPC00400029196

9	8	4	8
PPLPC00400029820 4	PPLPC00400030729 5	PPLPC00400031091 3	PPLPC00400031271 7
PPLPC00400031272 2	PPLPC00400031274 7	PPLPC00400031276 0	PPLPC00400031292 3
PPLPC00400031293 1	PPLPC00400031691 7	PPLPC00400032534 2	PPLPC00400032535 9
PPLPC00400032536 9	PPLPC00400032549 4	PPLPC00400032550 4	PPLPC00400032559 4
PPLPC00400032763 1	PPLPC00400034661 5	PPLPC00400036366 4	PPLPC00400036367 4
PPLPC00400036370 4	PPLPC00400036372 8	PPLPC00400036374 0	PPLPC00400036374 6
PPLPC00400036382 4	ENDO- OPIOID_MDL- 02787843	ENDO- OPIOID_MDL- 02795079	ENDO- OPIOID_MDL- 02795081
ENDO- OPIOID_MDL- 02813419	ENDO- OPIOID_MDL- 02813421	ENDO- OPIOID_MDL- 02813573	MCKMDL00586574
MCKMDL00586751	MCKMDL00586798	MCKMDL00586952	MCKMDL00590051
MCKMDL00590138	MCKMDL00590197	MCKMDL00590200	MCKMDL00590203
ABDCMDL0030170 0	E01_00014630	E01_00031608	E01_00008003
E01_00008364	E513_00005376	E513_00023314	E513_00023330
E513_00023520	E513_00023531	E513_00087838	E513_00088620
PPLPC00800004084 5	PPLPC00800004084 7	PPLPC00800004098 9	PPLPC00800004216 8
PPLPC00800004984 2	PPLPC00800005285 8	PPLPC00800005285 9	PPLPC00800005342 8
PPLPC00800005342 9	PPLPC00800005968 2	PPLPC00800005972 5	PPLPC00800005973 0
PPLPC00800005973 3	PPLPC00800005973 7	PPLPC00800005974 6	PPLPC00800005976 6
PPLPC00800005977 0	PPLPC00800005977 5	PPLPC00800005977 8	PPLPC00800005978 2
PPLPC00800005979 1	PPLPC00800006056 4	PPLPC00800006057 3	PPLPC00800006058 1
PPLPC00800006279 2	PPLPC00800006280 7	PPLPC00800006281 6	PPLPC00800006407 2
PPLPC00800006407 8	PPLPC00800006408 5	PPLPC00800006409 8	PPLPC00800006411 1
PPLPC01000004051 9	PPLPC01000004052 3	PPLPC01000004052 7	PPLPC01200007423 2
PPLPC01200033843 6	PPLPC01300028038 2	PPLPC01400001792 0	ABDCMDL0030774 4
PPLPC01600000108	CAH_MDL2804_008	CAH_MDL2804_008	CAH_MDL2804_008

5	12909	12911	24045
CAH_MDL2804_008 51292	CAH_MDL2804_008 55757	CAH_MDL2804_008 55970	CAH_MDL2804_008 55992
CAH_MDL2804_008 56925	CAH_MDL2804_008 79572	CAH_MDL2804_008 83107	CAH_MDL2804_008 88665
CAH_MDL2804_009 16951	CAH_MDL2804_009 54965	CAH_MDL2804_009 54969	CAH_MDL2804_010 05903
CAH_MDL2804_010 07171	CAH_MDL2804_010 67205	CAH_MDL2804_010 67218	CAH_MDL2804_010 67222
CAH_MDL2804_010 88992	CAH_MDL2804_010 88994	CAH_MDL2804_010 92127	CAH_MDL2804_010 92227
CAH_MDL2804_011 10712	CAH_MDL2804_011 10714	CAH_MDL2804_011 10752	CAH_MDL2804_011 10755
CAH_MDL2804_011 10774	PPLPC01700005932 2	PPLPC01700050503 7	PPLPC01700078247 9
Anda_Opioids_MDL _0000281624	PAR_OPIOID_MDL _0000009576	PAR_OPIOID_MDL _0000009577	MCKMDL00612053
PAR_OPIOID_MDL _0000034624	PAR_OPIOID_MDL _0000034625	PAR_OPIOID_MDL _0000034660	PAR_OPIOID_MDL _0000034664
PAR_OPIOID_MDL _0000034668	PAR_OPIOID_MDL _0000034669	PAR_OPIOID_MDL _0000034679	PAR_OPIOID_MDL _0000034699
PAR_OPIOID_MDL _0000034723	PAR_OPIOID_MDL _0000034729	PAR_OPIOID_MDL _0000035398	ALLERGAN_MDL_ 03358162
ALLERGAN_MDL_ 03358164	TEVA_MDL_A_064 41369	TEVA_MDL_A_064 42134	TEVA_MDL_A_064 42137
TEVA_MDL_A_064 42140	TEVA_MDL_A_065 31603	TEVA_MDL_A_065 31616	TEVA_MDL_A_055 08891
PPLPC01900005463 9	PPLPC01900006693 5	PPLPC01900013851 9	PPLPC01900019108 9
PPLPC01900020313 6	PPLPC01900021659 5	PPLPC01900024761 3	PPLPC01900024761 4
PPLPC01900024897 8	PPLPC01900027493 8	PPLPC01900053677 9	PPLPC01900056877 6
PPLPC01900056884 3	PPLPC01900060569 8	PPLPC01900109151 6	PPLPC01900120624 4
PPLPC01900125138 8	PPLPC01900130543 3	PPLPC01900137240 1	PPLPC01900139533 5
PPLPC01900139715 9	PPLPC01900140882 7	HDS_MDL_0008557 5	HDS_MDL_0008660 8
HDS_MDL_0008662 2	HDS_MDL_0008662 6	HDS_MDL_0008729 6	HDS_MDL_0008730 1
HDS_MDL_0008962 9	HDS_MDL_0008963 0	HDS_MDL_0008963 6	HDS_MDL_0008965 2
HDS_MDL_0008965 6	HDS_MDL_0009030 1	HDS_MDL_0009178 5	HDS_MDL_0009305 4
HDS_MDL_0009316	HDS_MDL_0009338	HDS_MDL_0009410	HDS_MDL_0009547

7	0	2	1
HDS_MDL_0009547 3	HDS_MDL_0009590 1	HDS_MDL_0009590 3	HDS_MDL_0009590 6
HDS_MDL_0009786 6	HDS_MDL_0009786 8	HDS_MDL_0009860 0	ENDO- OPIOID_MDL- 04063441
TEVA_MDL_A_066 18679	TEVA_MDL_A_067 87911	Acquired_Actavis_00 657203	PPLPC02000004164 9
PPLPC02100000924 4	PPLPC02100002812 1	PPLPC02100002812 2	PPLPC02100004856 9
PPLPC02100004857 1	PPLPC02100004908 5	PPLPC02000017064 1	PPLPC02000017136 6
PPLPC02000018111 4	PPLPC02000021724 8	PPLPC02200002491 8	PPLPC02100007524 4
PPLPC02300003085 7	PPLPC02200004402 4	PPLPC02200004402 6	PPLPC02200004525 0
PPLPC02200004528 3	PPLPC02200004856 9	PPLPC02200004857 0	PPLPC02000037359 7
PPLPC02200006884 7	PPLPC02200007001 8	PPLPC02200007390 6	PPLPC02200007845 6
PPLPC02100017058 8	PPLPC02100017700 4	PPLPC02000050401 1	PPLPC02000050449 2
PPLPC02000050682 3	PPLPC02000050686 4	PPLPC02200016473 6	PPLPC02200018348 6
PPLPC02100022320 4	PPLPC02100022320 7	PPLPC02000059312 5	PPLPC02300029445 2
PPLPC02100029054 1	PPLPC02300031255 1	PPLPC02300039569 0	PPLPC02100037441 5
PPLPC02100039019 6	PPLPC02100039724 8	PPLPC02100041800 5	PPLPC02200044436 2
PPLPC02200045104 4	PPLPC02200051675 2	PPLPC02200055951 3	PPLPC02200056040 3
PPLPC02000096269 6	MCKMDL00629193	MCKMDL00634410	MCKMDL00634412
PPLPC02000112466 3	PPLPC02000115099 7	PPLPC02000115110 3	PPLPC02100083560 7
ABDCMDL0031483 5	CAH_MDL2804_013 56261	CAH_MDL2804_013 56263	CAH_MDL2804_013 56264
CAH_MDL2804_014 06072	CAH_MDL2804_014 06170	CAH_MDL2804_015 21412	CAH_MDL2804_016 59930
CAH_MDL2804_016 59931	CAH_MDL2804_017 24114	CAH_MDL2804_017 24159	CAH_MDL2804_017 24160
CAH_MDL2804_017 24190	CAH_MDL2804_017 73826	PPLPC01800005554 2	PPLPC01800005735 0
PPLPC01800005735 2	PPLPC01800005811 5	PPLPC01800005811 6	PPLPC01800005812 5

PPLPC01800006973 7	PPLPC01800006973 8	PPLPC01800009990 1	PPLPC01800019377 9
PPLPC01800020032 3	PPLPC01800021950 6	PPLPC01800023324 8	PPLPC01800025137 4
PPLPC01800025437 7	PPLPC01800030678 7	PPLPC01800032885 5	PPLPC01800038570 1
PPLPC01800041474 7	PPLPC01800041914 0	PPLPC01800050933 4	PPLPC01800054023 2
PPLPC01800054031 1	PPLPC01800056311 8	PPLPC01800057162 1	PPLPC01800057162 2
PPLPC01800123555 7	PPLPC01800126008 2	PPLPC01800132041 0	PPLPC01800144545 8
PPLPC01800144742 3	PPLPC01800144742 8	PPLPC01800147259 2	PPLPC01800147648 0
PPLPC01800147648 2	PPLPC01800147648 6	PPLPC01800147719 8	MNK- T1_0002300075
HDS_MDL_0017404 4	HDS_MDL_0018724 3	HDS_MDL_0019068 0	HDS_MDL_0019221 0
HDS_MDL_0022599 0	HDS_MDL_0022599 3	HDS_MDL_0022627 2	HDS_MDL_0024620 7
TEVA_MDL_A_070 80636	PPLPC02500007255 5	PPLPC02500007274 2	PPLPC02500007790 2
PPLPC02500007864 8	PPLPC02500007872 8	PPLPC02500007872 9	PPLPC02500007873 9
PPLPC02400012138 6	Acquired_Actavis_00 904866	JAN-MS-03062709	ABDCMDL0032046 8
ABDCMDL0032047 2	ABDCMDL0032047 3	ABDCMDL0032142 7	ABDCMDL0032168 6
PAR_OPIOID_MDL _0000350884	PAR_OPIOID_MDL _0000358728	CAH_MDL2804_021 30307	CAH_MDL2804_021 53203
CAH_MDL2804_021 53205	CAH_MDL2804_022 99756	CAH_MDL2804_023 09086	CAH_MDL2804_024 07632
CAH_MDL2804_024 07755	CAH_MDL2804_024 67269	CAH_MDL2804_024 67271	CAH_MDL2804_024 71223
CAH_MDL2804_025 27595	CAH_MDL2804_025 34915	CAH_MDL2804_027 01368	CAH_MDL2804_027 01372
CAH_MDL2804_027 01671	CAH_MDL2804_027 01672	CAH_MDL2804_027 01678	CAH_MDL2804_028 41323
ALLERGAN_MDL_ 03536260	PAR_OPIOID_MDL _0001041087	PAR_OPIOID_MDL _0001041162	PAR_OPIOID_MDL _0001060096
PAR_OPIOID_MDL _0001060097	PAR_OPIOID_MDL _0001060823	PAR_OPIOID_MDL _0001060825	PPLP004369268
PPLP004369320	PPLP004369327	PPLP004369333	PPLP004369351
PPLP004369500	PPLP004369529	PPLP004369583	PPLP004370033
PPLP004370188	PPLP004370274	PPLP004370586	PPLP004371671
PPLP004371675	PPLP004372055	PPLP004372076	PPLP004372079

PPLP004372091	PPLP004372097	PPLP004372108	PPLP004372111
PPLP004372122	PPLP004372126	PPLP004372136	PPLP004372143
PPLP004372147	PPLP004372150	PPLP004372158	PPLP004372163
PPLP004372170	PPLP004372585	PPLP004372598	PPLP004373118
PPLP004373300	PPLP004373991	PPLP004376509	PPLP004376811
PPLP004376850	PPLP004376910	PPLP004377153	PPLP004377179
PPLP004377193	PPLP004377216	PPLP004377397	PPLP004379025
PPLP004379174	PPLP004379445	PPLP004379805	PPLP004379823
PPLP004379840	PPLP004379850	PPLP004380553	PPLP004380613
PPLP004381102	PPLP004381156	PPLP004381221	PPLP004381240
PPLP004381260	PPLP004381263	PPLP004381269	PPLP004381281
PPLP004381294	PPLP004381303	PPLP004381309	PPLP004381385
PPLP004381389	PPLP004381503	PPLP004381669	PPLP004381671
PPLP004381692	PPLP004381744	PPLP004382082	PPLP004382159
PPLP004382176	PPLP004382189	PPLP004382232	PPLP004382243
PPLP004382258	PPLP004382265	PPLP004382288	PPLP004382309
PPLP004382726	PPLP004382736	PPLP004384719	PPLP004384747
PPLP004385307	PPLP004385310	PPLP004385312	PPLP004385367
PAR_OPIOID_MDL _0001252760	PPLPC02600001859 0	PPLPC02600001859 4	PPLPC02600002450 0
PPLPC02600002476 1	PPLPC02600002476 2	PPLPC02600002478 1	PPLPC02600002478 3
PPLPC02600002487 8	PPLPC02600002530 8	PPLPC02600002531 4	PPLPC02600002531 5
PPLPC02600002531 7	PPLPC02600002532 4	PPLPC02600002726 3	PPLPC02600003545 0
PPLPC02600004317 1	PPLPC02600006478 3	PPLPC02600006481 4	PPLPC02600006615 3
PPLPC02600007082 2	PPLPC02600007164 8	PPLPC02600008371 3	PPLPC02600008570 8
PPLPC02600008765 8	PPLPC02600008811 1	PPLPC02600009128 4	PPLPC02600009380 0
PPLPC02600009420 4	PPLPC02600009587 0	PPLPC02600009624 3	PPLPC02600009838 9
PPLPC02600010063 8	PPLPC02600010074 8	PPLPC02600010163 7	PPLPC02600010592 7
PPLPC02600010593 6	PPLPC02600010594 3	PPLPC02600011126 5	PPLPC02600011127 7
HDS_MDL_0040479 3	HDS_MDL_0040479 6	ABDCMDL0035861 0	PPLPC02800011643 6
PPLPC02800020381 9	PPLPC02800023352 4	PPLP004396800	PPLP004396802
PPLP004396804	PPLP004396805	PPLP004396809	PPLP004396815
PPLP004396820	PPLP004396821	Acquired_Actavis_01 177377	Acquired_Actavis_01 177379

Acquired_Actavis_01 177457	Acquired_Actavis_01 177538	Acquired_Actavis_01 180554	Acquired_Actavis_01 180555
Acquired_Actavis_01 180557	Acquired_Actavis_01 289144	Acquired_Actavis_01 303886	Acquired_Actavis_01 303887
Acquired_Actavis_01 303890	Acquired_Actavis_01 384980	Acquired_Actavis_01 384983	Acquired_Actavis_01 450963
Acquired_Actavis_01 451474	Acquired_Actavis_01 692439	PAR_OPIOID_MDL _0001355513	PPLPC03100021737 4
PPLPC03100021737 6	PPLPC03100022016 7	PPLPC03100022176 6	PPLPC03100022176 8
PAR_OPIOID_MDL _0001425447	PPLPC03200001577 8	PPLPC03200038842 0	MNK- T1_0005650829
MCKMDL00649999	MCKMDL00651559	MCKMDL00651560	MCKMDL00651561
Acquired_Actavis_02 049007	Acquired_Actavis_02 150725	PPLPC03400049002 6	MCKMDL00652420
MCKMDL00652423	MCKMDL00652446	MCKMDL00652447	MCKMDL00652683
HDA_MDL_000042 481	HDA_MDL_000042 483	HDA_MDL_000042 484	HDA_MDL_000052 021
PPLPC03500000220 0	TEVA_MDL_A_097 68138	TEVA_MDL_A_097 72234	TEVA_MDL_A_097 72235
TEVA_MDL_A_097 72237	TEVA_MDL_A_097 72241		

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of December, 2018, the foregoing has been served via email only to the Defendants in this action via the following listserv email address designated by Defendants pursuant to Special Master Cohen's September 17, 2018 Order Concerning Service in Track One Cases (Dkt. No. 983):

xALLDEFENDANTS-MDL2804-Service@arnoldporter.com

/s/Mark Pifko

Mark Pifko

*On behalf of Co-Lead Counsel and the
Plaintiffs' Executive Committee*